IN THE UNITED STATES DISTIRCT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

VICTOR J. FREDERICKS, On behalf of himself and all similarly situated individuals,

Plaintiff,

v.

BLACK KNIGHT SECURITY, INC., and GENERAL INFORMATION SOLUTIONS, LLC,

Defendants.

Civil Action No.: 2:21-cv-00533

Honorable Robert J. Colville

CLASS ACTION

STIPULATION TO ARBITRATE AND DISMISS CLAIMS AGAINST BLACK KNIGHT SECURITY

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiff Victor J. Fredericks ("Fredericks") and Defendant Black Knight Security, Inc. ("Black Knight Security"), by and through their undersigned counsel, hereby submit this Stipulation to Arbitrate and Dismiss Claims against Black Knight Security, and in support thereof, state the following:

- 1. Fredericks and Black Knight Security are parties to an agreement to arbitrate that would cover the claims Fredericks has asserted against Black Knight Security.
- 2. Fredericks and Black Knight Security have agreed to dismiss the claims that Fredricks asserted against Black Knight Security in the instant Complaint, without prejudice.
- 3. This stipulation of dismissal has been signed by all parties that have made an appearance in this case, including the other defendant named by Fredericks, General Information Solutions, LLC.

Fredericks and Black Knight Security therefore respectfully request that (a) this Court order that the claims asserted against Black Knight Security be submitted to arbitration pursuant

to Fredericks' and Black Knight Security's arbitration agreement, and (b) that those claims be dismissed without prejudice.

SO STIPULATED.

DATED this 23rd day of June, 2021

/s/ Leonard A. Bennett

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Counsel for Plaintiff

AND NOW, this 24th, day of June, 202),

UNITED STATES DISTRICT JUDGE

DATED this 23rd day of June, 2021

/s/ Marla N. Presley

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